

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

## **Notice of Motion**

Asia Ibrahim  
9521 Lawler Ave.  
Skokie, IL 60077

Chapter 13  
Case No. 18 B 28393  
Judge Timothy A Barnes

On January 17, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, January 9, 2019.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 744
- > Chicago, IL 60604

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

## **Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 10/09/2018.
  2. The debtor(s) have failed to provide an Affidavit of Compliance.
  3. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
  4. The debtor(s) have failed to attend one scheduled §341(a) meeting of the creditors
  5. The debtor(s) have failed to provide required identification and or social security documentation.
  6. The debtor(s) have failed to resolve the pending objection(s) to the plan.
  7. The debtor(s) have failed to commit all disposable income to the plan.
  8. The debtor(s) have failed to file a feasible plan. The proposed plan now runs 75 months.
  9. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE